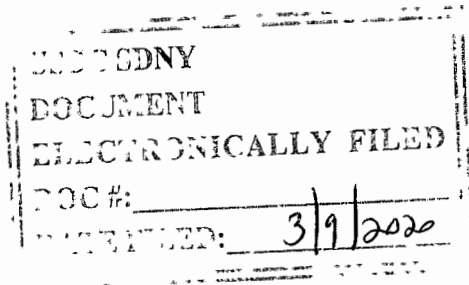


KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | SUITE 7110
NEW YORK, NEW YORK 10118
TEL (212) 763-0883 | FAX (212) 564-0883
WWW.KAPLANHECKER.COM



DIRECT DIAL 212.763.0889
DIRECT EMAIL shecker@kaplanhecker.com

March 6, 2020

BY ECF

MEMO ENDORSED

Honorable Colleen McMahon
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Chambers 2550
New York, New York 10007

3/9/2020
Supervised Release proceedings
adjourned to April 1, 2020
at 2:15.
Colleen McMahon

Re: *United States v. Fernandez et al*, 12-cr-445-CM-10

Dear Chief Judge McMahon:

I write with the consent of the Government and the Probation Department to request a brief, two-week adjournment of our upcoming Violation of Supervised Release (VOSR) hearing for defendant Lamont Robinson, which is currently scheduled for March 11, 2020 at 2:15 pm.

Procedural History

We first appeared on this matter in front of Your Honor on September 23, 2019. A VOSR hearing in this case was originally scheduled for November 19, 2019. With the consent of the Government and the Probation Department, we previously requested three adjournments of that hearing, which the Court granted. The hearing was adjourned to March 11, 2020 at 2:15 pm.

Request for Adjournment

As the Court is aware, Mr. Robinson currently has an open criminal case in Bronx County (#01086-2019) for which the next scheduled appearance is on March 10, 2020. In the interim, Mr. Robinson's counsel in the state case is still receiving discovery and has not yet received a certificate of compliance from the District Attorney in the Bronx pursuant to New York State's recently enacted discovery reforms. *See* N.Y. CPL § 245. The District Attorney has also filed a motion to extend its time to complete discovery in that case. The alleged

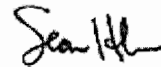
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criminal conduct in the Bronx forms the bases for the alleged violations of the conditions of Mr. Robinson's supervised release, and we believe it would be prudent to have an opportunity to be fully briefed on the proceedings in state court prior to appearing again before Your Honor.

With the consent of the Government and the Probation Department, I am therefore requesting a two-week adjournment to give the parties time to see what developments occur in the Bronx matter before we next appear in this matter. To the extent the Court is available, the parties have discussed and could all appear before Your Honor on the afternoon of March 25 between 2:00 and 4:00 pm, or on the afternoon of March 27, 2020. I ask further that Mr. Robinson's current conditions of release remain in place until our next appearance.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sean Hecker", written in a cursive style.

Sean Hecker

cc: (by ECF)

Samuel P. Rothschild and Andrew Adams
Assistant United States Attorneys

Erin Weinrauch
United States Probation Officer